

# EXHIBIT 34

THE HONORABLE THOMAS S. ZILLY

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

HUNTERS CAPITAL, LLC, et al.,

Plaintiffs,

v.

CITY OF SEATTLE,

Defendant.

Case No. 20-cv-00983

PLAINTIFF SRJ ENTERPRISES, d/b/a  
CAR TENDER'S ANSWERS AND  
RESPONSES TO DEFENDANT CITY OF  
SEATTLE'S FIRST DISCOVERY  
REQUESTS

Pursuant to Rules 26, 33, and 34 of the Federal Rules of Civil Procedure, Plaintiff SRJ Enterprises, d/b/a Car Tender ("SRJ Enterprises" or "Plaintiff") hereby responds and objects to Defendant City of Seattle's ("Defendant" or the "City") First Discovery Requests containing Defendant's first sets of Interrogatories and Requests for Production. No admissions of any nature whatsoever are implied or should be inferred from the answers, responses, and objections set forth below. Plaintiff has answered these requests based on its current knowledge and understanding with respect to the matters addressed in the requests. Discovery in this action is on-going. Plaintiff reserves its right to alter, supplement, modify, or otherwise amend its responses as necessary or appropriate.

1 have no relevance to the claims or defenses in this case. Plaintiff further objects to this request in  
 2 so far as it calls for production of documents not in Plaintiff's possession or documents that are  
 3 otherwise publicly available and equally available to the City.

4 Without waiving any objection, and subject to continuing investigation, Plaintiff will  
 5 conduct a reasonable search for documents in its possession relevant to the claims and defenses  
 6 in this case and will produce responsive, non-privileged documents, if any, within a reasonable  
 7 time, on a rolling basis.

8 **REQUEST FOR PRODUCTION NO. 7:**

9 Please produce all documents (including without limitation emails and texts) reflecting any  
 10 communications between any plaintiff and any other person or business concerning any of the  
 11 CHOP activities alleged in the complaint.

12 **RESPONSE:**

13 Plaintiff objects to this request as vague, ambiguous, overly broad, unduly burdensome,  
 14 and duplicative in so far as it calls for the production of "all" documents and communications  
 15 involving any person, plaintiff, or business. Plaintiff further objects to this request in so far as it calls  
 16 for production of documents not in Plaintiff's possession or documents that are otherwise publicly  
 17 available and equally available to the City.

18 Without waiving any objection, and subject to continuing investigation, Plaintiff will  
 19 conduct a reasonable search for documents relevant to the claims and defenses in this case and will  
 20 produce responsive, non-privileged documents, if any, within a reasonable time, on a rolling basis.

21 **REQUEST FOR PRODUCTION NO. 8:**

22 Please produce all documents reflecting any damages you claim to have suffered as a result  
 23 of any "lack of public-safety assistance" alleged in the complaint.

24 **RESPONSE:**

25 Plaintiff objects to this request as vague, ambiguous, overly broad, unduly burdensome,

business interruptions outside of the geographic area or timeframe at issue in this case and are therefore unrelated to the claims and defenses at issue as well as an immense burden and far out of proportion to the needs of the case.

Without waiving any objection, and subject to continuing investigation, Plaintiff will conduct a reasonable search for documents relevant to the claims and defenses in this case, including documents concerning any closures related to the CHOP or that occurred in buildings affected by the CHOP for the time period requested, and will produce any responsive, non-privileged documents, if any, within a reasonable time, on a rolling basis.

**REQUEST FOR PRODUCTION NO. 30:**

Please produce all documents reflecting the identity of any business opportunities (e.g., prospective engagements, customers, or tenants) you contend that you lost as a result of the CHOP activities alleged in the complaint.

**RESPONSE:**

Plaintiff objects to this request as vague, ambiguous, overly broad, unduly burdensome, and duplicative. Without waiving any objection, and subject to continuing investigation, Plaintiff will conduct a reasonable search for documents relevant to the claims and defenses in this case and will produce responsive, non-privileged documents, if any, within a reasonable time, on a rolling basis.

**DATED this 15th day of January, 2021.**

By /s/ Patty A. Eakes

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PLAINTIFF SRJ ENTERPRISES, d/b/a CAR  
TENDER'S ANSWERS AND RESPONSES TO  
DEFENDANT CITY OF SEATTLE'S FIRST  
DISCOVERY REQUESTS  
Case No. 20-cv-00983 - 24

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*Attorneys for Plaintiffs*

1 RESPONSES dated this \_\_\_\_\_ day of \_\_\_\_\_, 2021.

2 SRJ ENTERPRISES, d/b/a CAR TENDER

3 By: \_\_\_\_\_

4 Its: \_\_\_\_\_

5  
6 **VERIFICATION**

7 STATE OF WASHINGTON )

) ss.

8 COUNTY OF KING )

9 \_\_\_\_\_, being duly sworn, on oath says:

10 That he/she is the \_\_\_\_\_ of SRJ ENTERPRISES, d/b/a CAR TENDER;  
11 that he/she has read the answers and responses to CITY OF SEATTLE'S FIRST DISCOVERY  
12 REQUESTS TO PLAINTIFF SRJ ENTERPRISES, d/b/a CAR TENDER, knows the contents  
13 thereof and believes the same to be true and correct.

14 \_\_\_\_\_  
15  
16 SUBSCRIBED AND SWORN TO before me this \_\_\_\_\_ day of \_\_\_\_\_,  
17 2021.

18 [PRINT NAME] \_\_\_\_\_

19 NOTARY PUBLIC in and for the State of Washington,

20 residing at \_\_\_\_\_

21 My appointment expires: \_\_\_\_\_